

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

v.

AT&T MOBILITY LLC,

Defendant.

Case No.: 5:19-cv-00475-BO

DECLARATION OF NANCY L. STAGG

I, Nancy L. Stagg, declare as follows:

1. I am a U.S. citizen over the age of eighteen (18) years. I make this Declaration in support of Defendant AT&T Mobility LLC's ("AT&T") Response to Plaintiff Jason Williams' Motion to Compel Production of Documents. The facts set forth in this Declaration are stated upon my own personal knowledge. If called to testify to the following, I could do so truthfully and competently.

2. I am an attorney duly licensed and admitted to practice law in the State of California and am admitted pro hac vice in this action. I am a partner in the law firm of Kilpatrick Townsend & Stockton LLP. I am counsel of record for Defendant AT&T Mobility LLC in this action.

3. On or about August 19, 2019, Plaintiff Jason Williams, through his counsel, Christopher LaVigne, sent a demand letter to AT&T Mobility LLC. The letter stated Mr. Williams' intent to bring claims against AT&T in federal court in North Carolina

relating to the allegedly unauthorized SIM changes on his AT&T wireless telephone account in thirty days. Ultimately this action was filed on or about October 24, 2019 (ECF 1, Complaint).

4. In connection with this action, and at the direction of AT&T's corporate litigation counsel Niki Okcu, and retained outside counsel, the undersigned and Michael Breslin, AT&T Asset Protection investigator Robert Arno prepared an investigative report entitled "2019-11-21 Jason Williams AP Executive Summary." That document, which is logged on the AT&T Privilege Log as ATT_Priv_20-ATT_Priv_30 (LaVigne Decl., Ex. J, at ECF 137-10), was prepared at the direction of litigation legal counsel after the filing of this action by Mr. Williams. The purpose of the investigative report was to allow litigation counsel to evaluate Mr. Williams' claims and prepare AT&T defenses to the action and to provide legal advice to AT&T regarding Mr. Williams' claims. Since its creation, this document has been maintained as privileged and confidential pursuant to the attorney-client privilege and attorney work product protection.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of May 2022 at San Diego, California.



Nancy L. Stagg